

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

XIAOTIAN LIU

Plaintiff,

v.

KRISTI NOEM, in her official capacity, et al.,

Defendants.

Case No. 1:25-cv-00133-SE-TSM

DECLARATION OF ATTORNEY SANGYEOP KIM

I, SangYeob Kim, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I submit this declaration in support of Plaintiff's Motion for Preliminary Injunction.
2. I am over eighteen years of age and am competent to make this Declaration.
3. I am an attorney with the American Civil Liberties Union of New Hampshire.
4. I am one of the attorneys representing Plaintiff in the instant case.
5. Attached hereto as exhibits are true and correct copies of the following.

Exhibit Documents

- A. Affidavit of Xiaotian Liu (dated April 10, 2025).
- B. Email from Plaintiff's School.
- C. Plaintiff's LinkedIn Public Profile.
- D. Plaintiff's Published Article.
- E. ICE Policy Guidance 1004-04 – Visa Revocations.
- F. Guidance Directive 2016-03 9 FAM 403.11-3 – Visa Revocation.
- G. NHPR News Article.
- H. CBS8 News Article.

I. Boston.com News Article.

J. Affidavit of Attorney Stephanie Elona Young Marzouk.

K. Email on Research and Class.

L. Email on the Updated SEVIS.

M. Ph.D. Student Progress Evaluation of Department of Computer Science,

I declare under penalty of perjury that the foregoing is true and correct.

/s/SangYeob Kim

SangYeob Kim

Executed on April 10, 2025.